

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

<p><b>MARIAN SNOW,</b></p> <p style="padding-left: 100px;"><b>Plaintiff,</b></p> <p><b>v.</b></p> <p><b>GENERAL ELECTRIC COMPANY, DELL TECHNOLOGIES, DELL, INC., and DELL EMC,</b></p> <p style="padding-left: 100px;"><b>Defendants.</b></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p><b>CASE NO. 7:17-cv-01961-LSC</b></p>
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**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND  
TO PLAINTIFF'S COMPLAINT**

Defendants Dell Technologies, Dell Inc., and Dell EMC (collectively “Dell”) move for an extension of the time in which they must plead, move, or otherwise respond to the Complaint filed by Plaintiff Marian Snow (“Plaintiff”). Plaintiff has consented to the relief sought in this motion.

The grounds for this motion are as follows:

1. Plaintiff filed the First Amended Complaint on December 6, 2017. Dkt. No. 4.
2. Service was executed on Dell Inc. on December 8, 2017, and on Dell Technologies December 11, 2017. Dkt. Nos. 6, 9.

3. Defendant Dell Inc.'s answer is due on December 29, 2017. Defendant Dell Technologies' answer is due on January 1, 2018.

5. The Complaint raises complex factual and legal issues and will require additional time for Dell to prepare and serve its response. Dell therefore respectfully seeks an extension of time in which it must plead, move, or otherwise respond to the Complaint to January 19, 2018. The new date would be applicable for all Dell defendants to respond to the complaint. No previous extensions of time have been sought or granted.

5. Counsel for Dell has conferred with Plaintiff, and Plaintiff has agreed to the requested extension.

6. For the foregoing reasons, Dell respectfully requests that this Consent Motion be granted.

**Dated: December 27, 2017**

Respectfully submitted,

/s/ Derin Dickerson

Derin B. Dickerson

(*Pro hac vice* application forthcoming)

Cassie Johnson

(*Pro hac vice* application forthcoming)

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*Counsel for Dell Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of the filing to the Plaintiff.

This 27th day of December, 2017.

/s/ Derin B. Dickerson

Derin B. Dickerson

*(pro hac vice application forthcoming)*

Cassie Johnson

*(pro hac vice application forthcoming)*

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